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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR MOTION IN
LIMINE NO. 2 AND WAYMO'S BRIEF IN
OPPOSITION THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Administrative Motion to File Under
7 Seal Portions of their Motion in Limine No. 2 and Waymo's Brief in Opposition Thereto (the
8 "Administrative Motion"). The Administrative Motion seeks an order sealing the entirety of Exhibit 4
9 to the Declaration of Martha Goodman ("Exhibit 4").

10 3. Exhibit 4 (portions highlighted in green in version filed herewith) contains, reference,
11 and/or describes Waymo's highly confidential and sensitive business information, Such information
12 includes details regarding Waymo's security measures and protocols, the scope of forensic
13 investigations conducted , and detailed computer forensics regarding access to Waymo's trade secrets.
14 I understand that Waymo maintains this information as confidential. The public disclosure of this
15 information would cause significant competitive harm to Waymo, as its security measures and
16 computer forensics methods would become known to competitors who could use such information to
17 Waymo's disadvantage. Exhibit 4 (portions highlighted in green in version filed herewith) also
18 contains the email addresses and/or phone numbers of Waymo employees and former employees
19 involved in this case, the disclosure of which would cause Waymo and those employees substantial
20 harm due to the high public profile of this litigation.

21 4. Waymo's request to seal is narrowly tailored to those portions of Exhibit 4 that merit
22 sealing. The request is consistent with previous sealing requests granted by the Court. (*See, e.g.,* Dkt.
23 1444.)

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on September 18, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven